

THE HONORABLE RICHARD A. JONES

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

STEVE TEIXEIRA,

Plaintiff,

v.

MOZILLA CORPORATION a.k.a. M.F.
Technologies, a California corporation;
MOZILLA FOUNDATION, a California
public benefit corporation; LAURA
CHAMBERS and her marital community;
WINIFRED MITCHELL BAKER and her
marital community, and DANI CHEHAK and
her marital community,

Defendants.

Case No.: 2:24-CV-01032-RAJ

[PROPOSED] ORDER GRANTING
PLAINTIFF'S SECOND MOTION TO
COMPEL

THIS MATTER came before the Court on Plaintiff's Second Motion to Compel. This Court has considered the records and files in this proceeding, including the following materials submitted by the parties:

1. Plaintiff's Motion to Compel Discovery Requests to Mozilla Corporation ("Mozilla") and Individual Defendants (Dani Chehak and Laura Chambers);
2. Declaration of Mathew Herrington In Support of Plaintiff's Motion to Compel, with exhibits;
3. Response to Plaintiff's Motion to Compel, if any;

[PROPOSED] ORDER GRANTING PLAINTIFF'S SECOND
MOTION TO COMPEL - 1
60606-003

STOKES LAWRENCE, P.S.
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4. Reply to Plaintiff's Motion to Compel, if any;

The Court having reviewed the files and records herein, and being fully advised, **NOW THEREFORE,**

1. Mozilla is compelled to disclose information about other employees who separated from Mozilla after taking leaves of absence (like Plaintiff) and/or after Requesting Disability Accommodation (like Plaintiff), as this information is requested in Interrogatories 8-10, 12, and Requests for Production 11 and 21 to Mozilla. Mozilla must produce this information within 14 days.

GRANTED _____ DENIED _____

2. Defendants Mozilla, Chambers, and Chehak are compelled to disclose summaries, follow up, communications, and other requested information about the TK Law assessment of Mozilla's cultural competence, i.e., its discriminatory practices, as this information is requested in Requests for Production 26 and 27 to Mozilla and Request for Production 2 to Chambers and Chehak. Mozilla, Chambers, and Chehak must produce this information within 14 days.

GRANTED _____ DENIED _____

DATED _____, 2025

THE HONORABLE RICHARD A. JONES

Presented by:

1 STOKES LAWRENCE, P.S.

2 By: /s/Mathew Harrington

3 Amy Alexander (WSBA #44242)

Mathew Harrington (WSBA #33276)

4 Maricarmen Perez-Vargas (WSBA # 54344)

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